

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**IN RE:**

**ALEXANDER E. JONES**  
*Debtor*

**CHAPTER 11  
CASE NO. 22-33553**

**SPECIAL NOTICE OF APPEARANCE AND  
REQUEST FOR SERVICE OF NOTICES AND PAPERS**

**PLEASE TAKE NOTICE** that Gibbons, P.C. hereby enters its special notice of appearance (the “Notice of Appearance”) in the above-captioned adversary proceeding as counsel for Discover Fund Management, Inc., a U.S. Virgin Islands corporation, pursuant to section 1109(b) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (as amended, the “Bankruptcy Code”), and Rules 2002, 9007, and 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and request that copies of any and all notices and papers filed or entered in this case be given to and served upon the following:

Dale E. Barney, Esq.  
**GIBBONS P.C.**  
One Gateway Center  
Newark, New Jersey 07102  
Telephone: (973) 596-4500  
Email: [dbarney@gibbonslaw.com](mailto:dbarney@gibbonslaw.com)

**PLEASE TAKE FURTHER NOTICE** that pursuant to section 1109(b) of the Bankruptcy Code, this request includes not only the notices and papers referred to in the Bankruptcy Rules, but also includes, without limitation, any notice, motion, proposed order, application, petition, pleading, request, complaint, demand, memorandum, affidavit, declaration, presentment, order to show cause, disclosure statement, and plan of reorganization, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier

service, hand-delivery, telephone, facsimile, electronic mail, or otherwise, that is filed or given in connection with the above-captioned cases and the proceedings therein.

**PLEASE TAKE FURTHER NOTICE** that neither this Notice of Appearance nor any prior or later appearance, pleading, or claim waives (i) any right to have final orders in non-core matters entered only after *de novo* review by a district court judge; (ii) any right to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; (iii) any right to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; (iv) an election of remedies; or (v) any other substantive or procedural right including without limitation jurisdictional defenses.

**PLEASE TAKE FURTHER NOTICE** that this Notice of Appearance is without prejudice to any other rights, claims, actions, defenses, setoffs, or recoupments under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments against a debtor or any other entity either in these cases or in any other action are expressly reserved.

Dated: November 21, 2024  
Newark, New Jersey

**GIBBONS P.C.**

By: /s/ Dale E. Barney  
Dale E. Barney, Esq  
One Gateway Center  
Newark, New Jersey 07102  
Telephone: (973) 596-4500  
Email: dbarney@gibbonslaw.com

*Counsel to Discover Fund Management, Inc.*

**CERTIFICATION OF SERVICE PURSUANT TO 11 U.S.C. § 1746**

DALE E. BARNEY, of full age, under penalty of perjury, hereby certifies as follows:

1. I am an attorney-at-law of the State of New Jersey and a Director with Gibbons P.C., counsel for Discover Fund Management, Inc. in the above-captioned Chapter 11 proceeding.
2. On November 21, 2024, I caused a true and correct copy of the foregoing *Special Notice of Appearance and Request for Service of Notices and Papers* to be served upon all parties having formally requested notice electronically via the Court's CM/ECF system.

I certify that the foregoing is true and correct.

Executed on: November 21, 2024

/s/ Dale E. Barney

Dale E. Barney